1		District Judge Tana Lin	
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7	UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE		
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9	MATIN MAVADDAT, et al.,	Case No. 2:24-cv-00057-TL	
10 11	Plaintiffs, v.	STIPULATED MOTION TO HOLD CASE IN ABEYANCE AND [PROPOSED] ORDER	
12 13	UNITED STATES DEPARTMENT OF STATE, et al.,	Noted for Consideration: March 19, 2024	
14	Defendants.		
15	Plaintiffs and Defendants, by and through their counsel of record, pursuant to Federal Rule		
16	of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and move to		
17	stay these proceedings through May 24, 2024. Plaintiffs bring this litigation pursuant to the		
18	Administrative Procedure Act seeking, <i>inter alia</i> , to compel Defendants to complete processing of		
19	their non-immigrant visa applications. Defendants' response to the Complaint is currently due on		
20	March 25, 2024. For good cause, the parties request that the Court hold this case in abeyance		
21	through May 24, 2024.		
22	Courts have "broad discretion" to stay proceedings. Clinton v. Jones, 520 U.S. 681, 706		
23	(1997). "[T]he power to stay proceedings is incidental to the power inherent in every court to		
24	control the disposition of the causes on its docket with economy of time and effort for itself, for		
	STIPULATED MOTION [Case No. 2:24-cv-00057-TL] - 1	UNITED STATES ATTORNEY 1201 Pacific Avenue, Suite 700 Tacoma, Washington 98402	

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1	counsel, and for litigants." Landis v. N. Am. Co., 299 U.S. 248, 254 (1936); see also Fed. R. Civ	
2	P. 1.	
3	With additional time, this case may be r	esolved without the need of further judicial
4	intervention. Security screening was very recen	ntly completed for Plaintiff Mavaddat. The
5	consular officer will next review the visa applicatio	n files and determine the next steps required in
6	the processing of the applications. If it is determine	ned that no additional information is required,
7	the consular officer will complete processing of the	neir visa applications. This process will take
8	additional time.	
9	Accordingly, the parties respectfully request that the instant action be stayed until	
10	May 24, 2024. The parties will submit a joint status report on or before May 24, 2024.	
11	DATED this 19th day of March, 2024.	
12	Respectfully submitted,	
13 14	TESSA M. GORMAN United States Attorney	LAW OFFICE OF NICHOLAS POWER
15	s/Michelle R. Lambert MICHELLE R. LAMBERT, NYS #4666657 Assistant United States Attorney	s/Nicholas Power NICHOLAS POWER, WSBA# 45972 5040 Guard, Ste. 150
16	United States Attorney's Office Western District of Washington	Friday Harbor, Washington 98250 Phone: 360-298-0464
17	1201 Pacific Avenue, Suite 700 Tacoma, WA 98402	Email: nickedpower@gmail.com
18	Phone: (253) 428-3824 Fax: (253) 428-3826	<u>s/James O. Hacking, III</u> JAMES O. HACKING, III*
19	Email: michelle.lambert@usdoj.gov	HACKING IMMIGRATION LAW, LLC 10121 Manchester Rd., Ste. A
20	Attorneys for Defendants	St. Louis, Missouri 63122 Phone: 314-961-8200
21	I certify that this memorandum contains 262 words, in compliance with the Local Civil Rules.	Email: jim@hackingimmigrationlaw.com *PHV
22		Attorneys for Plaintiff
23		, J
24		

STIPULATED MOTION [Case No. 2:24-cv-00057-TL] - 2 UNITED STATES ATTORNEY 1201 Pacific Avenue, Suite 700 Tacoma, Washington 98402 (253) 428-3800

[PROPOSED] ORDER The case is held in abeyance until May 24, 2024. The parties shall submit a joint status report on or before May 24, 2024. It is so **ORDERED**. DATED this 19th day of March 2024. Yana St. Tana Lin United States District Judge